

WEIL, GOTSHAL & MANGES LLP  
Stephen Karotkin (*pro hac vice*)  
(stephen.karotkin@weil.com)  
Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
767 Fifth Avenue  
New York, NY 10153-0119  
Tel: 212 310 8000  
Fax: 212 310 8007

KELLER & BENVENUTTI LLP  
Tobias S. Keller (#151445)  
(tkeller@kellerbenvenutti.com)  
Jane Kim (#298192)  
(jkim@kellerbenvenutti.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: 415 496 6723  
Fax: 650 636 9251

*Proposed Attorneys for Debtors  
and Debtors in Possession*

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF MOTIONS TO BE HEARD  
AT MARCH 27, 2019 OMNIBUS  
HEARING**

Date: March 27, 2019

Time: 9:30 a.m. (Pacific Time)

Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

**Objection Deadline:** March 20, 2019  
4:00 p.m. (Pacific Time)

1       **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E  
2 Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and  
3 debtors in possession (the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11**  
4 **Cases**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States  
Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the Northern District  
of California (San Francisco Division) (the “**Bankruptcy Court**”).

5       **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on  
6 **March 27, 2019, at 9:30 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) in the courtroom of the  
Honorable Dennis Montali, United States Bankruptcy Judge, Courtroom 17, 16th Floor, 450 Golden  
Gate Avenue, San Francisco, California 94102.

7       **PLEASE TAKE FURTHER NOTICE** that, in addition to matters previously scheduled for  
8 the Omnibus Hearing, the Bankruptcy Court will hear the four motions filed by the Debtors on  
9 March 6, 2019, and listed below (the “**Motions**”).

10       **MOTIONS TO BE CONSIDERED AT THE OMNIBUS HEARING**

11       1.     **Butte County Prepetition Settlement Agreement Motion.** Motion of Debtors  
12 Pursuant to 11 U.S.C. §§ 363(b) and 105(a) for Authority to Continue Performance under Prepetition  
Settlement Agreement with Butte County District Attorney’s Office to Fund Enhanced Fire  
13 Prevention and Communications Program [Dkt No. 770].

14       2.     **Supplemental Prepetition Taxes Motion.** Supplemental Motion of Debtors  
15 Pursuant to 11 U.S.C. §§ 105(a), 363(b), 507(a), and 541(d) and Fed. R. Bankr. P. 6004 Authorizing  
Debtors to Pay Prepetition Taxes and Assessments and Granting Related Relief [Dkt No. 761].

16       3.     **Hedging Programs Motion.** Motion Pursuant to 11 U.S.C. §§ 105, 363, and 364 and  
17 Fed. R. Bankr. P. 6004 Authorizing Debtors to (A) Continue Hedging Programs, (B) Enter Into  
Postpetition Hedging Transactions, and (C) Pledge Collateral and Honor Obligations Thereunder  
18 [Dkt No. 780].

19       4.     **STIP Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c)  
20 for Entry of an Order Approving (I) Short-Term Incentive Plan and (II) Granting Related Relief [Dkt  
No. 782].

21       **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Motions  
22 must be in writing, filed with the Bankruptcy Court, and served on the counsel for the Debtors at the  
above-referenced addresses so as to be received by no later than **4:00 p.m. (Pacific Time) on**  
23 **March 20, 2019**. Any oppositions or responses must be filed and served pursuant to the *Order*  
*Implementing Certain Notice and Case Management Procedures* (“**Case Management Order**”)  
24 [Dkt No. 759] entered on March 6, 2019. Any oppositions or responses must be served on all  
“Standard Parties” as defined in paragraph 5 of the Case Management Order. **Any relief requested**  
25 **in the Motions may be granted without a hearing if no opposition is timely filed and served in**  
26 **accordance with the Case Management Order.** In deciding the Motions, the Court may consider  
any other document filed in these Chapter 11 Cases and related Adversary Proceedings.

1 **PLEASE TAKE FURTHER NOTICE** that copies of each pleading identified herein can be  
2 viewed and/or obtained: (i) by accessing the Court's website at <http://www.canb.uscourts.gov>, (ii) by  
3 contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA  
4 94102, or (iii) from the Debtors' notice and claims agent, Prime Clerk LLC , at  
5 <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based  
6 parties; or +1 (929) 333-8977 for International parties or by e-mail at: [pgeinfo@primeclerk.com](mailto:pgeinfo@primeclerk.com).  
7 Note that a PACER password is needed to access documents on the Bankruptcy Court's website.

8 Dated: March 6, 2019

9 **WEIL, GOTSHAL & MANGES LLP**

10 **KELLER & BENVENUTTI LLP**

11 /s/ Tobias S. Keller

12 Tobias S. Keller

13 *Proposed Attorneys for Debtors and Debtors in*  
14 *Possession*